

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

JACKSON HARMON ENTERPRISES,
LLC, d/b/a MIDWEST TOWING, A
Nebraska Limited Liability Company,

CASE NO. 8:13 CV 03194-RGK-CRZ

Plaintiff,

PROTECTIVE ORDER

v.

INSURANCE AUTO AUCTIONS, INC., An
Illinois Corporation,

Defendant.

Plaintiff's counsel, W. Patrick Betterman, alone and unaccompanied by any owner, employee, representative or other agent of Plaintiff, may review the Insurance Auto Auctions, Inc. ("IAA") Salvage Book – Manual of IAA Processes ("Salvage Book") at the offices of Baird Holm LLP. Other than to request portions of the Salvage Book from IAA, Mr. Betterman may not copy, take notes, or photograph any portion of the Salvage Book. Mr. Betterman is not to remove any portions of the Salvage Book from the offices of Baird Holm without the prior written approval of IAA's legal counsel, Jennifer Tricker. If during the review of the Salvage Book, or within 24 hours of the review, Mr. Betterman determines that he would like copies of any portion thereof, he must make a written request to Ms. Tricker for copies of such sections. Upon receipt of such written request, Ms. Tricker will have one business day to respond to Mr. Betterman's request with either a copy of the requested section(s) or an objection regarding the same. If at that time the parties are unable to reach an agreement as to the production of certain portions of the Salvage Book, each may bring the appropriate motion with the Court. During the pendency of any such motions, Mr. Betterman agrees that all of the information he learned is subject to the

existing Protective Order (Filing #27) and that he will not share any of the information that is at dispute with anyone (other than his staff and the Court in preparation for any hearing or written argument) until the Court resolves such dispute. It is further ordered that Mr. Betterman is to consider any information he learns during his review of the Salvage Book to be confidential and proprietary and subject to the Protective Order (Filing #27).

Except as limited above, nothing herein precludes any party from designating any eventual production of any portion of the Salvage Book as CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER, as allowed in Filing #27.

August 26, 2014.

BY THE COURT:

A handwritten signature in blue ink, appearing to read "Cheryl R. Zwart", is written over a horizontal line.

Cheryl R. Zwart
United States Magistrate Judge